



POSNICK CENTER OF
INNOVATIVE TECHNOLOGY
FERRO CORPORATION

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October 2, 2006

Via USPO Certified Mail Return Receipt

Stephen L. Johnson, Administrator
U.S. Environmental Protection Agency
Ben Franklin Post Office
P.O. Box 862
Washington, D.C. 20044

Attention: Chemical Right-to-Know Program

Dear Administrator Johnson:

Ferro Corporation actively supports the High Production Volume (HPV) Challenge Program, part of Chemical Right-to-Know, with our participation. Ferro Corporation is pleased to submit the revised and updated test plan and robust summaries for the following product:

Ferro Product:	Santicizer® 141
Chemical Name:	2-Ethylhexyl diphenyl phosphate
CAS Number:	1241-94-7

We are pleased that we completed testing with a minimal number of new tests, and with no new animal tests. We understand that this submission will be posted by USEPA and will be available for comment for a period of 120 days. Please direct questions or comments regarding this submission to me. Please feel free to contact me at 216-750-6696 or olsona@ferro.com.

Sincerely,

Alan J. Olson, P.E.
Director of Technology and
Product Stewardship
Ferro Corporation

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